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EG&G ROCKY FLATS, INC.
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April 22, 1994

94-RF-04735

J. M. Roberson
Acting Assistant Manager for
Environmental Restoration
DOE, RFO



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Attn: B. E. Williamson

OPERABLE UNIT NO. 2 (OU-2) FIELD TREATABILITY UNIT (FTU) SPILL RESPONSE AND DOWNTIME MINIMIZATION - SGS-268-94

This memorandum is written in response to the Department of Energy's (DOE) concern over spill response and down time (periods of non-collection) at the OU-2 FTU.

Project personnel at the OU-2 FTU are sensitive to the RCRA requirements that are associated with handling and treating contaminated water. All project managers and operations personnel (EG&G and subcontractors) undergo classroom and On-the-Job Training for RCRA requirements at the Rocky Flats Plant. Items pertaining to RCRA are passed onto personnel as Required Readings, and must be reviewed by all OU-2 FTU personnel. Spill response kits are onsite and available for use in the event of unplanned spills or releases.

On March 10, 1994, the OU-2 FTU influent line failed, releasing approximately 200 gallons of untreated water onto the ground near the pipe failure, and approximately 6000 gallons of untreated water to collection weir #61 (via the secondary containment pipe). The 200 gallon estimate was made from visual observations at the site. The 6000 gallon estimate was calculated from the influent flow meter readings.

The following actions have been taken to mitigate any future spills and minimize periods of non-collection at the FTU:

- Visual inspection of the influent line now occur every four hours. OU-2 FTU shift order number FTU-94-02 directs the OU-2 FTU Operations and Maintenance subcontractor to perform the increased surveillance. Training to this shift order was performed in accordance with Conduct of Operations.
- Installation of permanent power has been accelerated (construction began April 15, 1994 and is expected to be completed by July 1, 1994). Power generation from diesel generators has caused many periods of non-collections and occurrences over the past three years.
- 3. Three additional influent/effluent tanks (13,000 gallons each) have been ordered and are expected to be in use by July 1, 1994. The new tanks will provide additional surge capacity that will significantly reduce periods of non-collection. Treatment of additional ER incidental water will be easily handled with the additional storage capacity.

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- 4. The capacity of the unit has been increased to allow for treatment of additional ER sources and to minimize maintenance downtime.
- 5. A Decision Process for response to future spills at the FTU has been generated. We are awaiting CDH concurrence prior to implementation.
- 6. Hourly round sheets have been modified (Shift Order No. FTU-94-02) to increase tank level and influent flow readings to every half-hour. The improved round sheets allow the operators to more closely monitor influent flow to the FTU, and detect variations in flow which may indicate pipeline failure.

In the event of an unavoidable situation resulting in a shutdown of the facility, several measures are taken to allow as much collection of influent water as possible. Planned shutdowns are scheduled at times of low precipitation and maximum surge water storage capacity. Shift Order FTU-94-06 requires the OU-2 subcontractor to continue collecting Surface Water location 59 (SW59) only during a shutdown whenever possible. DOE has requested to the regulators that the other two sites (SW61 and SW132) be discontinued from collection due to their history. Collection of SW59 can be fully attained during an extended shutdown due to its low influent rate (approximately one gallon per minute).

If you have any questions or concerns, please contact myself or Maria Broussard at extension 8517.

Matthins for S. G. Stiger

Associate General Manager

Environmental Restoration Management

EG&G Rocky Flats, Inc.

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Orig. and 1 cc - J. M. Roberson

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